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5 Attorney for Debtor Sharon Mahoney

6 **UNITED STATES BANKRUPTCY COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA**

8 In the Matter of:) Case No. 10-57326
9 Sharon Mahoney) **PRE-HEARING STATEMENT**
10)
11 Debtor) Pre-Hearing Date: 1/11/2011
Pre-Hearing Time: 1:45PM
Place: 280 South First Street, Room 3020
Judge: Arthur S. Weissbrodt

12 Debtor, Sharon Mahoney,

13 Has addressed all objections of the Chapter 13 Trustee, including the 1 objection filed by the
14 trustee on 10/25/2010 and the 4 objections filed by the trustee on 8/26/2010. The objections were
15 addressed as follows:

16 Objections dated 10/25/2010:

17 1. Debtor uploaded certificate of service regarding service on all secured creditors of the Second
Amended Plan, filed September 2nd, 2010, which is docket number 28.

18 Objections dated 8/26/2010:

- 19 1. Debtor's 2009 Tax Return was not required to be filed by the IRS due to low income, and
20 declaration by debtor stating the above was submitted to trustee by e-mail on 8/27/2010.
21 2. Debtor filed an amended Schedule D to list address of HOA Central Park, which is docket
number 18. Debtor also amended the list of creditors to include said creditor, which is docket
22 number 16. Lastly, Debtor served the required Chapter 13 notices listed in Trustee's objection
number 2 on creditor HOA Central Park, and uploaded the proof of service, which is docket
23 number 22.
24 3. Plan language amended to instruct Trustee to pay 2nd lien as a general unsecured claim;
Trustee's staff attorney also stated that Trustee no longer objects for this; docket number 21.
25 4. SFA amended to include debtor's past 2 years gross income; docket number 19.

26 Debtor believes that the above objections have all been resolved based on discussions with the
27 trustee's case analyst on 10/14/2010 and 10/27/2010, and therefore, there are no legal and/or
28 factual issues to be resolved by the court in connection with the trustee's prior objections.

Dated: 10/27/2010

/s/ Zachary Tyson, esq.
Attorney for Debtor